UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

S2 15-cr-379 (PKC)

JUAN HERNANDEZ ALVARADO, Defendant.

DEFENDANT JUAN HERNANDEZ'S MOTION FOR RELEASE ON BAIL PENDING TRIAL

COMES NOW DEFENDANT, Juan Antonio Hernandez Alvarado, by undersigned counsel, and requests that this Court order his pretrial release pending resolution of his case. 18 U.S.C. §3142. Filed contemporaneously with this pleading is Mr. Hernandez's memorandum of argument and authority in support of his motion.

Request for Pretrial Services Report

Mr. Hernandez respectfully requests that the Court order the Pretrial Services Agency to conduct an interview of the defendant on Friday, January 4, 2019, in anticipation of the 3:00 p.m. bond hearing.

Dated: January 2, 2019

Respectfully submitted,

RETURETA & WASSEM, P.L.L.C.

By: _____

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cc: All parties via ECF filing.